

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_  
In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

\_\_\_\_\_  
Debtors.

)  
) Chapter 11  
)

) Case No. 22-10964 (MG)  
)

) (Jointly Administered)  
)

**FOURTH DECLARATION OF BENJAMIN J. STEELE IN SUPPORT OF THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS' APPLICATION FOR  
ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION  
OF KROLL RESTRUCTURING ADMINISTRATION LLC AS NOTICING AND  
INFORMATION AGENT TO THE COMMITTEE EFFECTIVE AS OF AUGUST 5, 2022**

I, Benjamin J. Steele, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Managing Director of Kroll Restructuring Administration LLC (“**Kroll**”),<sup>2</sup> noticing and information agent to the Committee, whose principal office is located at 55 East 52nd Street, 17<sup>th</sup> Floor, New York, New York 10055. I am authorized to submit this declaration on behalf of Kroll.

2. I submit this declaration (the “**Fourth Declaration**”) in support of *The Official Committee of Unsecured Creditors' Application for Entry of an Order Authorizing the Employment and Retention of Kroll Restructuring Administration LLC as Noticing and Information Agent to the Committee Effective as of August 5, 2022*, filed August 11, 2022 [Docket No. 433] (the “**Application**”), filed by the Committee, and as a supplement to my previously

<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of their federal tax identification number are as follows: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application (as defined below).

submitted declarations [Docket Nos. 443-2, 775, and 1348] (the “**Prior Declarations**”) in support of the Application. On September 15, 2022, the Court entered an order approving the Application [Docket No. 827].

3. After the filing of the Prior Declarations, counsel to the Debtors provided Kroll with the names of additional potential parties in interest identified on **Schedule 1** annexed hereto (the “**Supplemental Parties in Interest List**”). The results of the conflict check for this Supplemental Parties in Interest List were compiled and reviewed by Kroll professionals under my supervision.

4. Based on the additional parties added to the Supplemental Parties in Interest List, I hereby supplement my Prior Declarations to disclose the following connections, each of which Kroll believes does not present an interest adverse to the Debtors’ estates and is disclosed solely out of an abundance of caution:

- Gabriel Brunswick, Associate General Counsel of Kroll, was formerly an associate at Willkie, counsel to the Blockchain Recovery Investment Consortium in connection with these chapter 11 cases. Mr. Brunswick left Willkie in January 2020. Mr. Brunswick did not work on any matters involving Blockchain Recovery Investment Consortium or the Debtors during his time at Willkie.
- James Waldron, former Clerk of the United States Bankruptcy Court for the District of New Jersey, joined Kroll as Senior Advisor in March 2017. Mr. Waldron’s daughter, Keara Waldron, is a counsel at Lowenstein Sandler LLP, counsel to Zach Kaplan, Michael Kaplan, Eli Kaplan, Ben Kaplan, and Michael Mazzotta.

5. As disclosed in my Prior Declarations, Kroll is an indirect subsidiary of Kroll, LLC (“**Kroll Parent**”). Kroll Parent is the world’s premier provider of services and digital products

related to governance, risk and transparency. Within the Kroll Parent corporate structure, Kroll operates independently from Kroll Parent. As such, any relationships that Kroll Parent and its affiliates maintain do not create an interest of Kroll's that is materially adverse to the Debtors' estates or any class of creditors or security holders.

6. Notwithstanding the foregoing, out of an abundance of caution, Kroll hereby discloses that certain Kroll employees and temporary employees under their general supervision have provided administrative project management and data review services to a confidential client of Kroll Parent that appears on the Potential Parties in Interest List. Such confidential client of Kroll Parent is also a Confidential Party as defined in the Court's *Order (I) Authorizing All Parties to Redact and File Under Seal the Names of Certain Confidential Parties in Interest Related to the Potential Sale of Certain or Substantially All of the Debtors' Assets and the Potential Procurement of Debtor-in-Possession Financing and (II) Granting Related Relief* [Docket No. 1431]. The services provided to the confidential client by Kroll and Kroll Parent are unrelated to the Debtors and these chapter 11 cases. Kroll therefore believes that this connection does not present an interest adverse to the interests of the Debtors' estates or of any class of creditors or equity security holders.

7. To the best of my knowledge, Kroll continues to be a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code and does not hold or represent an interest materially adverse to the Debtors' estates.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Benjamin J. Steele  
Benjamin J. Steele  
Managing Director  
Kroll Restructuring Administration LLC

**Schedule 1**

Supplemental Parties in Interest List

<b>Name</b>	<b>Category</b>
Lowenstein Sandler LLP	Notice of Appearance / Pro Hac Vice
McElroy, Deutsch, Mulvaney & Carpenter, LLP	Notice of Appearance / Pro Hac Vice
Orrick, Herrington & Sutcliffe LLP	Notice of Appearance / Pro Hac Vice
Pennsylvania Office of Attorney General	Notice of Appearance / Pro Hac Vice
Wadsworth, Garber, Warner and Conrardy, P.C	Notice of Appearance / Pro Hac Vice
Arrington Capital	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
Beowulf Energy LLC	Potential Bidding Parties and Principals
Blockchain Recovery Investment Committee	Potential Bidding Parties and Principals
Brown Rudnick LLP	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
Jason New	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
Michael Abbate	Potential Bidding Parties and Principals
Michael Cagney	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
Paul, Weiss, Rifkind, Wharton & Garrison LLP	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
Terawulf	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
US Bitcoin Corp.	Potential Bidding Parties and Principals
[Redacted]	Potential Bidding Parties and Principals
Van Eck Absolute Return Advisers Corporation	Potential Bidding Parties and Principals
Willkie Farr & Gallagher LLP	Potential Bidding Parties and Principals
Aaron Dale Higbee	Retail Customers
Adam David Fritz	Retail Customers
Adam Joscelyne	Retail Customers
Adam Kryskow	Retail Customers
Alain Bonvecchio	Retail Customers
Alfred Bokhour	Retail Customers
Amirhossein Aminsharifi	Retail Customers
Andy Tran	Retail Customers
Annette Christine Davies	Retail Customers
Ariel Ceja	Retail Customers
Austin Wilcox	Retail Customers
Balazs Lesko	Retail Customers

<b>Name</b>	<b>Category</b>
Benjamin Julian Dame	Retail Customers
Berne Loh Tai Yuan	Retail Customers
Biao Shou	Retail Customers
Brandon Singer	Retail Customers
Brian Bang	Retail Customers
Brian Barnes	Retail Customers
Bryan Perl	Retail Customers
Calvin Spencer Rawe	Retail Customers
Cherktyek Consulting, Llc	Retail Customers
Christian Ander	Retail Customers
Christopher Chung	Retail Customers
Christopher James Maudlin	Retail Customers
Christopher Shey-Tau Sun	Retail Customers
Clarence Thomas	Retail Customers
Clint Worden	Retail Customers
Cort Kibler-Melby	Retail Customers
Craig Wilson Mcgarrah Iii	Retail Customers
Daniel Miller	Retail Customers
David Anthony Sims	Retail Customers
David Arie Schneider	Retail Customers
David Carl Lindahl	Retail Customers
David Dennis	Retail Customers
David Fahrney	Retail Customers
David Jeffries	Retail Customers
David Little	Retail Customers
Davis Chan	Retail Customers
Dias Malayev	Retail Customers
Didier Pawlicki	Retail Customers
Dimitris Zourdos	Retail Customers
Don Hosea Smith	Retail Customers
Donald Jay Vinberg	Retail Customers
Eduardo Sy Jr Buenviaje	Retail Customers
Four Thirteen Llc	Retail Customers
Franklin Kashner	Retail Customers
George Chavous	Retail Customers
George Vasile	Retail Customers
Gregory Allen Kieser	Retail Customers
Hamad Alshamsi	Retail Customers
Hayden Smith	Retail Customers
Heather Trussell	Retail Customers
Herman Vissia	Retail Customers
Hr National Pty Ltd	Retail Customers
Ivari Kuuse	Retail Customers
J&J Hoffard Pty Ltd Atf Hoffard Family Trust	Retail Customers
Jacob Daniels	Retail Customers
Jacob John Ring	Retail Customers
Jad Jubayli	Retail Customers
Jansen P Del Vecchio	Retail Customers
Jason Colling	Retail Customers

<b>Name</b>	<b>Category</b>
Jeffrey J Bradian	Retail Customers
Jeffrey R Kerr	Retail Customers
Jianwei Hu	Retail Customers
JLS Projects, LLC	Retail Customers
John Cioffoletti	Retail Customers
John Robert Kemenosh	Retail Customers
Johnny Piquero	Retail Customers
Jon Collins-Black	Retail Customers
Jonathon Robert Prendergast	Retail Customers
Joseph Michael Breher	Retail Customers
Keith Ryals	Retail Customers
Kipton Ford Anderson	Retail Customers
Law Offices Of Stefan Coleman, P.A	Retail Customers
Marc Shachtman	Retail Customers
Marcelo Tellez Anderson	Retail Customers
Marco Bonomi	Retail Customers
Mario Harrison Asp	Retail Customers
Mark E Blair	Retail Customers
Mark Finelli	Retail Customers
Mark Redeker	Retail Customers
Mathew Salazar	Retail Customers
Matias Ureta Montero	Retail Customers
Matthew Evan Scott	Retail Customers
Melissa Ann Licari	Retail Customers
Miae Kim	Retail Customers
Michael R Blemaster	Retail Customers
Michael Russell Fortwengler	Retail Customers
Mokrohond Btc Llc	Retail Customers
Nathan Boyd	Retail Customers
Nick Cousyn	Retail Customers
Nojan Jahedmanesh	Retail Customers
Paul Daniel Storvick	Retail Customers
Paul Mcneal	Retail Customers
Paz Paramdeep Dhody	Retail Customers
Peter Truss	Retail Customers
Peter Van Newhyzen	Retail Customers
Pietro Vincent Licari	Retail Customers
Rebecca N Egan	Retail Customers
Rena Cannaa	Retail Customers
Richard Gordon	Retail Customers
Rishi Raj Yadav	Retail Customers
Roshandip Singh	Retail Customers
Ryan Yukio Nakaima	Retail Customers
San Lo	Retail Customers
Scott Mashburn	Retail Customers
Sergi Sagas	Retail Customers
Shawn Steven Steinborn	Retail Customers
Stephen Hawkins	Retail Customers
Steven Thayer Spiller	Retail Customers
Tam II Holdings LLC	Retail Customers

<b>Name</b>	<b>Category</b>
Tarek Rajab Pacha	Retail Customers
Terence Foo	Retail Customers
Terry Parker	Retail Customers
Thomas Findlan	Retail Customers
Thomas Foo	Retail Customers
Thomas Schach	Retail Customers
Timothy Hiu Ki Lam	Retail Customers
Trent Johnson	Retail Customers
Umar Yusuf Girei	Retail Customers
Umesh Balani	Retail Customers
Vladimir Aneychik	Retail Customers
Vladislav Adzic	Retail Customers
Wesley Geunhyuk Chang	Retail Customers
William M Rogers	Retail Customers
Wing Hong Lai	Retail Customers
Yves Daniel Diserens	Retail Customers
Zaryn Dentzel	Retail Customers
U.S. Department of Treasury	Taxing Authority/Governmental/Regulatory Agencies
Selendy Gay Elsberg PLLC	UCC Professionals
Brett Flora	Notice of Appearance / Pro Hac Vice
Brown Connery	Notice of Appearance / Pro Hac Vice
CDP Investments Inc.	Notice of Appearance / Pro Hac Vice
Coan Payton & Paine	Notice of Appearance / Pro Hac Vice
Courtney Burks Steadman	Notice of Appearance / Pro Hac Vice
Illinois Secretary of State	Notice of Appearance / Pro Hac Vice
Joe Breher	Notice of Appearance / Pro Hac Vice
Josh Tornetta	Notice of Appearance / Pro Hac Vice
JR Law	Notice of Appearance / Pro Hac Vice
Keith Ryals	Notice of Appearance / Pro Hac Vice
Kim Flora	Notice of Appearance / Pro Hac Vice
Livingston PLLC	Notice of Appearance / Pro Hac Vice
Lucy Thomson	Notice of Appearance / Pro Hac Vice
Miles & Stockbridge	Notice of Appearance / Pro Hac Vice
Pennsylvania Department of Revenue	Notice of Appearance / Pro Hac Vice
Saul Ewing	Notice of Appearance / Pro Hac Vice
Texas Attorney General	Notice of Appearance / Pro Hac Vice
Willis Towers Watson US LLC	Notice of Appearance / Pro Hac Vice
Stout Risius Ross, LLC	Ordinary Course Professionals
Acxiom LLC	Vendors
Aguilar Castillo Love, S.r.l.	Vendors
Allied Universal	Vendors
American Arbitration Association	Vendors
Aon Consulting, Inc.	Vendors
Appleby (Bermuda) Limited	Vendors
Aquatech Solutions	Vendors
Argus, Inc.	Vendors
Bernstein & Andriulli	Vendors
BGOV LLC	Vendors
Board of European Students of Technology	Vendors



<b>Name</b>	<b>Category</b>
Bureau van Dijk Electronic Publishing Inc.	Vendors
Classic Exhibits Inc.	Vendors
DD Mrcourier Services	Vendors
DLA Piper	Vendors
EcoWaste	Vendors
EZ Blockchain Services	Vendors
Fragomen, Del Rey, Bernsen & Loewy, LLP	Vendors
FTI Consulting Technology LLC	Vendors
Global X Digital, LLC	Vendors
iFinex Inc.	Vendors
IP House Doo	Vendors
IVXS Technology USA	Vendors
IW Group Services (UK)	Vendors
J.B. Hunt	Vendors
Jackson Square Advisors, LLC	Vendors
Lindsey R. Mullholand	Vendors
Meltwater News US Inc	Vendors
Mothership Energy Group	Vendors
New Horizon Communications	Vendors
New Horizon Communications (NHC)	Vendors
Okta, Inc.	Vendors
Optimus SBR, Inc.	Vendors
Piper Alderman	Vendors
Prescient Comply, LLC	Vendors
RailsTech, Inc.	Vendors
Regulatory DataCorp Inc	Vendors
Salt Security, Inc	Vendors
Sarson Funds, Inc	Vendors
Saville & Co Scrivener Notaries	Vendors
Solutions Evenements	Vendors
Sorainen	Vendors
Systems MEC LLC	Vendors
TAMID Group	Vendors
The Crypto Can Man Ltd	Vendors
The Hartford	Vendors
Uria Menendez	Vendors
Vaco, LLC	Vendors
Bentley, Philip	Bankruptcy Judge
Bonnell, Julia	Bankruptcy Judges Staff
Pollan, Jennifer	Bankruptcy Judges Staff
A.M. Saccullo Legal, LLC	Bankruptcy Professionals - Retained
Fischer (FBC & Co.)	Bankruptcy Professionals - Retained
KE Andrews	Bankruptcy Professionals - Other
Andersen LLP	Bankruptcy Professionals - Other
Ernst & Young LLP	Bankruptcy Professionals - Retained
Gornitzky & Co.	UCC Professionals
M3 Advisory Partners, LP	UCC Professionals
Fahrenheit, LLC	Potential Bidding Parties and Principals
U.S. Data Mining Group, Inc. (d/b/a US	Potential Bidding Parties and Principals

<b>Name</b>	<b>Category</b>
Bitcoin Corp.)	
Proof Group Capital Management LLC	Potential Bidding Parties and Principals
Steven Kokinos	Potential Bidding Parties and Principals
Ravi Kaza	Potential Bidding Parties and Principals
GXD Labs LLC	Potential Bidding Parties and Principals
Plutus Lending LLC (d/b/a Abra)	Potential Bidding Parties and Principals
Gemini Trust Company, LLC	Potential Bidding Parties and Principals